

1 THE HONORABLE JOHN C. COUGHENOUR  
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10 **UNITED STATES DISTRICT COURT**  
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12 **WESTERN DISTRICT OF WASHINGTON**

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14 LEILANI WRIGHT, an individual,

15 Plaintiff,

16 v.

17 BELFOR USA GROUP, INC., a Foreign Profit  
18 Corporation d/b/a Belfor Property Restoration

19 Defendant.

20 Case No. 2:24-cv-00907-JCC

21 **JOINT MOTION TO EXTEND THE  
DISCOVERY DEADLINE TO TAKE  
PLAINTIFF'S DEPOSITION ON  
OCTOBER 16, 2025**

22 **NOTE ON MOTION CALENDAR:  
September 30, 2025**

23 Complaint filed June 3, 2024

24 Pursuant to Local Rule 7(d)(1) and 10(g), Plaintiff Leilani Wright ("Plaintiff"), and  
25 Defendant BELFOR USA GROUP, INC. ("Defendant") hereby stipulate, agree and request that this  
26 Court extend the discovery deadline from October 6, 2025 to October 16, 2025, for the limited  
purpose of taking Plaintiff's deposition on October 16, 2025. In support, the Parties stipulate and  
agree as follows:

27 1. Defendant removed this matter to federal court on June 24, 2024 (Dkt. No. 1).

1       2.     Defendant moved to dismiss certain of Plaintiff's claims, ultimately resulting in two  
2 orders partially granting those motions to dismiss (Dkt. Nos. 17 and 28).

3       3.     On October 4, 2024, this Court entered its Civil Trial Scheduling Order. (Dkt. No.  
4 24.)

5       4.     Since October 4, 2024, the Parties have been engaged in discovery, including the  
6 exchange of documents and written discovery.

7       5.     More recently, the Parties held settlement discussions. Those settlement discussions  
8 did not result in a resolution of this matter.

9       6.     Pursuant to this Court's Civil Trial Scheduling Order, discovery is scheduled to close  
10 on October 6, 2025. (Dkt. No. 24.)

11       7.     Defendant timely noticed Plaintiff's deposition to occur on October 6, 2025. Because  
12 Plaintiff has a medical procedure and is unable to attend her deposition on October 6, 2025, the  
13 Parties agree to and respectfully request a limited extension of the discovery deadline to allow  
14 Defendant to take Plaintiff's deposition on October 16, 2025. The Parties also agree that should any  
15 discovery-related dispute arise out of that deposition, that either Party may petition this Court to  
16 reopen discovery to address such dispute.

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8. Accordingly, the Parties agree that good cause exists for, and hereby request, that the Court order the discovery deadline extended from October 6, 2025 to October 16, 2025, solely for Defendant to take Plaintiff's deposition. This joint request is made in good faith.

RESPECTFULLY SUBMITTED this 30th day of September 2025.

## EMERY | REDDY, PLLC

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*Counsel for Plaintiff*

*Counsel for Defendant*

## ~~PROPOSED ORDER~~

Based on the foregoing stipulation of the Parties and GOOD CAUSE APPEARING, IT IS SO ORDERED that the case deadlines are amended as follows:

1. The discovery deadline is extended from October 6, 2025 to October 16, 2025, solely for Defendant to take Plaintiff's deposition.

DATED this 30th day of September 2025.

John C. Carpenter

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## THE HONORABLE JOHN C. COUGHENOUR

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing document was filed through the Court's CM/ECF System on September 30, 2025 and served on Counsel of Record.

/s/ Roxanne Mares  
Roxanne Mares